

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

PYONGHAE HELEN YUN,

Plaintiffs,

vs.

KOREAN AIR LINES CO., LTD.,

Defendant.

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CIVIL ACTION NO. 3:15-cv-2516

PLAINTIFF'S MOTION FOR DISMISSAL

1. Plaintiff moves for an order dismissing plaintiff's lawsuit without prejudice for re-filing of same.
2. The grounds for this motion are Plaintiff seeks a dismissal because Defendant claims there is no subject matter jurisdiction under the Montreal Convention in the United States. Rather than litigate the issue of subject matter jurisdiction, Plaintiff wishes to dismiss her case in the United States and proceed in Korea.
3. This motion is based on the pleadings and papers on file in this case and the attached memorandum of points and authorities.

Respectfully submitted,

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s/ Ladd C. Sanger

LADD C. SANGER

ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF CONFERENCE

I hereby certify that on July 11th, 2016, I conferred with Andrew Harakas, counsel for Defendant, and he does not oppose Plaintiff's Motion for Voluntary Dismissal.

s/ Ladd C. Sanger

LADD C. SANGER

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document shall be served via ECF on this 11th day of July, 2016, on the following:

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